BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

ORIGINAL

In the Matter of	
Advanced Television Systems and Their Impact on the Existing Television Broadcast Service	MM Docket No. 87-268
Review of Technical and Operational Requirements: Part 73-E, Television Broadcast Stations	Tentative Decision and Further Notice of Inquiry
Reevaluation of the UHF Television Channel and Distance Separation Requirements of Part 73 of the Commission's Rules	

COMMENTS
of
WATERWAY COMMUNICATIONS SYSTEM, INC.

Waterway Communications System, Inc. ("WATERCOM"), by its attorney, respectfully submits these Comments responsive to the Further Notice of Inquiry adopted by the Commission on September 1, 1988 concerning Advanced Television Systems ("ATV").1/

1/ 53 Fed. Reg. 38747 (October 3, 1988).

I.

INTRODUCTORY STATEMENT

1. WATERCOM is the operator of an Automated Maritime Telecommunications System ("AMTS") which operates along the Mississippi, Illinois and Ohio Rivers and the Gulf Intracoastal Waterway on frequencies in the 216-220 MHz band. The WATERCOM system brings telephone style and quality of service to vessels operating along the navigable rivers and waterways within range of the WATERCOM system. WATERCOM is interested in this proceeding by virtue that the frequency band allocated by the Commission for AMTS operations is adjacent to television channel 13 (210-216 MHz), and further by virtue that the Commission in the AMTS (nee, IWCS) allocation proceeding, FCC Gen. Docket No. 80-1, 84 F.C.C.2d 875 (1981), imposed engineering requirements and a non-interference condition upon AMTS service in order to protect television channel 10 and 13 reception.

II.

COMMENTS

2. WATERCOM commends and supports the Commission's decision to require ATV to operate within the existing VHF and UHF television allocations. Not only does WATERCOM have a substantial investment in its system, but also its users are relying upon the WATERCOM system for communication services never before available in the maritime operating environment.

The Commission established the goal of obtaining additional spectrum for short-range maritime communications services as a primary objective at the 1979 World Administrative Radio Conference; and it would be antithetical to that goal and also to the interests of both WATERCOM and its subscribers were the Commission to consider a reallocation for ATV purposes which could affect the maritime mobile allocation at 216-220 MHz.

3. In the Further Notice, the Commission addresses the issue of compatibility of ATV and NTSC receivers. WATERCOM respectfully submits that there is an additional issue which must be considered by the Commission, namely minimum technical standards for television receivers. Whereas receiver standards should be considered in conjunction with NTSC compatible receivers, it is imperative that the Commission establish technial standards for ATV receivers if ATV is to produce improved television signal quality. In the Commission's current rulemaking concerning expansion of AMTS service opportunities, Gen. Docket No. 88-372, the Association of Maximum Service Telecasters (MST) states that there is as much as 45 dB variation in the upper adjacent channel interference susceptibility among existing television receivers. MST Comments, Gen. Docket No. 88-372 (Sept. 26, 1988), Statement of Jules Cohen & Associates, P.4. MST takes the position in the Gen. Docket 88-372 proceeding that services operating in a frequency band adjacent to those allocated to

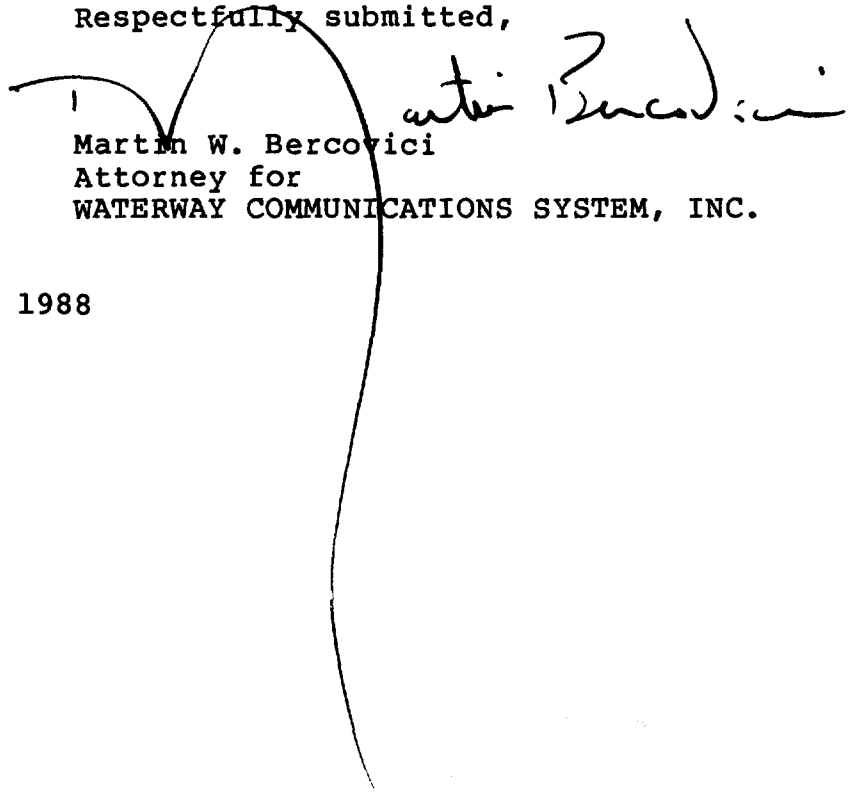
the television broadcast service should protect inefficient television receiver design. Obviously, MST's position is unacceptable in that it not only rejects good engineering practices, but also is contrary to effective management of the radio spectrum and the Commission's mandate under Section 1 of the Communications Act, 47 U.S.C. § 151.

4. More than a decade ago technical analysis by the Commission and its Office of Chief Engineer established that the cost differential between an IF strip of good quality and one of poor quality is less than $5.00 per television receiver. The price to the consumer of television sets more is influenced by the cabinet, advertising, and the "bells and whistles" which may be included in the set than it is by such engineering factors. Tolerating poor manufacturing practices benefits neither the broadcaster, the viewer, nor other users of the radio spectrum. WATERCOM accordingly urges the Commission to establish effective minimum television receiver standards in conjunction with promulgation of any rules which may permit development of Advanced Television Systems.

WHEREFORE, The Premises Considered, Waterway Communications System, Inc., respectfully urges the Federal Communications

Commission to adopt television receiver design standards in conjunction with any rule changes to recognize Advanced Television Systems.

Respectfully submitted,



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Due: November 30, 1988